

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	CRIMINAL NO. <u>02-801</u>
	:	
v.	:	DATE FILED: _____
	:	
LUIS RAMOS	:	VIOLATIONS:
a/k/a "Juan De La Cruz"	:	
a/k/a "Popeye"	:	21 U.S.C. § 846 (Conspiracy to distribute
ANTONIO OROZSCO	:	and possess with intent to distribute 1
a/k/a "Edwin Farinacci"	:	kilogram or more of heroin - 1 count)
a/k/a "El Monstro"	:	21 U.S.C. § 856 (a)(1) (Unlawfully
AMABLE RAMIREZ	:	maintaining a place for the manufacture of
a/k/a "Kerving Siez Matias"	:	controlled substances - 2 Counts)
ALEXIS RODRIGUEZ	:	21 U.S.C. § 841 (a)(1) (Distribution of
MARGARITA ORTIZ	:	heroin - 6 Counts)
ADRIAN RIOS-HERRERA	:	21 U.S.C. § 841 (a)(1) (Possession with
a/k/a "Luis Hernandez"	:	intent to distribute heroin - 5 Counts)
a/k/a "El Pintor"	:	18 U.S.C. § 2 (Aiding and abetting)
NICHOLAS DE LA CRUZ	:	21 U.S.C. § 853 (Notice of forfeiture)
a/k/a "Felix Bernabe"	:	(Notice of prior conviction)
NATIVIDAD SANTANA	:	
MARLYN GARCIA	:	
ANTHONY HURTADO	:	
a/k/a "Moreno"	:	
KENDYS VALDEZ	:	
a/k/a "Benny"	:	
LARCENY MARIA SUERO	:	
MAYRA ORTIZ	:	
TAWON UNDERWOOD	:	
MARLON UNDERWOOD	:	
TERRON TAYLOR	:	
WILLIAM SMITH	:	
LAWRENCE SMITH	:	
VERNON LITTLE	:	

SUPERSEDING INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. From at least in or around September 1, 2001, through on or about December 4, 2002, at Philadelphia, in the Eastern District of Pennsylvania, defendants

LUIS RAMOS,
a/k/a "Juan De La Cruz,"
a/k/a "Popeye,"
ANTONIO OROZSCO,
a/k/a "Edwin Farinacci,"
a/k/a "El Monstro,"
AMABLE RAMIREZ,
a/k/a "Kerving Siez Matias"
ALEXIS RODRIGUEZ
MARGARITA ORTIZ
ADRIAN RIOS-HERRERA,
a/k/a "Luis Hernandez,"
a/k/a "El Pintor,"
NICHOLAS DE LA CRUZ,
a/k/a "Felix Bernabe"
NATIVIDAD SANTANA
MARLYN GARCIA
ANTHONY HURTADO,
a/k/a "Moreno"
KENDYS VALDEZ,
a/k/a "Benny"
LARCENY MARIA SUERO
MAYRA ORTIZ
TAWON UNDERWOOD
MARLON UNDERWOOD
TERRON TAYLOR
WILLIAM SMITH
LAWRENCE SMITH
VERNON LITTLE

conspired and agreed, together and with others known and unknown to the grand jury, to

knowingly and intentionally distribute, and possess with intent to distribute, in excess of 1 kilogram of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a) and 841(b)(1)(A).

MANNER AND MEANS

2. It was part of the conspiracy that defendant LUIS RAMOS, a/k/a “Juan De La Cruz,” a/k/a “Popeye” operated a heroin packaging and distribution operation from Philadelphia, Pennsylvania, in which RAMOS obtained multi-hundred gram to multi-kilogram quantities of heroin from heroin sources of supply with links to Colombian-based heroin traffickers, including Alejandro Delgado, Wilson Patino, Brenda Campo-Valdez, each charged elsewhere, and defendants AMABLE RAMIREZ, a/k/a “Kerving Matias,” ALEXIS RODRIGUEZ, a/k/a “Alex,” MARGARITA ORTIZ, MARLYN GARCIA and ADRIAN RIOS-HERRRERA, a/k/a “Luis Hernandez,” a/k/a “El Pintor.”

It was a further part of the conspiracy that:

3. Defendant ANTONIO OROZSCO, a/k/a “Edwin Farinacci,” a/k/a “El Monstro,” was responsible for arranging the transportation and smuggling of heroin from Colombia and Ecuador to Philadelphia, Pennsylvania, for delivery in multi-kilogram quantities to Alejandro Delgado, a Philadelphia-based wholesale distributor of Colombian heroin, who utilized OROZSCO to arrange for the transportation and smuggling of heroin in order to further insulate himself from the couriers who were subject to the greatest risk of arrest by law enforcement.

4. Defendant ANTONIO OROZSCO, a/k/a “Edwin Farinacci,” a/k/a “El Monstro,” recruited and supervised couriers who smuggled Colombian heroin into the United States by

ingesting multi-hundred gram quantities of heroin pellets sealed in latex and expelling the heroin from their bodies upon arrival in Philadelphia, Pennsylvania. After the couriers expelled the heroin in Philadelphia, OROZSCO took custody of the heroin and transferred it to Alejandro Delgado for further distribution. OROZSCO was also responsible for coordinating payments of United States currency for heroin shipments to heroin traffickers in Colombia by use of couriers and money remitter services.

5. Alejandro Delgado regularly received kilogram quantities of heroin from defendant ANTONIO OROZSCO, a/k/a “Edwin Farinacci,” a/k/a “El Monstro,” stored the heroin at a Philadelphia “stash house,” and periodically delivered multi-kilogram quantities of heroin to defendant LUIS RAMOS, a/k/a “Juan De La Cruz,” a/k/a “Popeye,” who headed a heroin packaging and distribution operation in Philadelphia.

6. Defendant LUIS RAMOS, a/k/a “Juan De La Cruz,” a/k/a “Popeye” used cellular telephone facilities to arrange, negotiate and complete bulk heroin purchase transactions with his heroin sources of supply, Alejandro Delgado, Wilson Patino, Brenda Campo-Valdez, and defendants AMABLE RAMIREZ, a/k/a “Kerving Matias,” ALEXIS RODRIGUEZ, a/k/a “Alex,” MARGARITA ORTIZ, and ADRIAN RIOS-HERRERA, a/k/a “Luis Hernandez,” a/k/a “El Pintor.”

7. Defendant LUIS RAMOS, a/k/a “Juan De La Cruz,” a/k/a “Popeye” organized a heroin packaging operation in Philadelphia, Pennsylvania to complete the packaging of bulk quantities of heroin into thirteen-packet bundles ready for street distribution and sale in Pittsburgh, Pennsylvania.

8. Defendant LUIS RAMOS, a/k/a “Juan De La Cruz,” a/k/a “Popeye,” assembled

and paid a group of heroin packagers, including defendants NICHOLAS DE LA CRUZ, a/k/a “Felix Bernabe,” NATIVIDAD SANTANA, MARLYN GARCIA, ANTHONY HURTADO, a/k/a “Moreno,” KENDYS VALDEZ, a/k/a “Benny,” LARCENY MARIA SUERO and MAYRA ORTIZ to assist in transporting, processing and preparing heroin into multi-thousand bundle quantities, with stamped “brand” names on each glassine packet containing heroin, including “Holle Back,” “Hola,” and “Platinum,” for street distribution and sale.

9. Defendant LUIS RAMOS, a/k/a “Juan De La Cruz,” a/k/a “Popeye,” employed and paid defendant MAYRA ORTIZ exclusively to stamp “brand” names, including “Holle Back,” “Hola,” and “Platinum,” on multiple hundreds of thousands of glassine packets that were used by members of RAMOS’ heroin packaging operation.

10. Defendant LUIS RAMOS, a/k/a “Juan De La Cruz,” a/k/a “Popeye,” supplied a Pittsburgh-based street heroin distribution organization comprised of defendants TAWON UNDERWOOD, MARLON UNDERWOOD, TERRON TAYLOR, WILLIAM SMITH, LAWRENCE SMITH, VERNON LITTLE, with multi-thousand bundle shipments of stamped, pre-packaged heroin every two to three weeks, for which RAMOS charged \$65 per 13-packet bundle of heroin supplied.

11. Members of the Pittsburgh-based street heroin distribution organization traveled from Pittsburgh and elsewhere to Philadelphia using personally owned and rented automobiles to meet with, and accept delivery from defendant LUIS RAMOS, a/k/a “Juan De La Cruz,” a/k/a “Popeye,” of the pre-packaged multi-thousand bundles of heroin and to tender payment in United States currency to RAMOS for the heroin.

12. Defendant LUIS RAMOS, a/k/a “Juan De La Cruz,” a/k/a “Popeye” used cellular

telephone facilities to arrange, negotiate and complete heroin sale and delivery transactions with his heroin customers, the members of the Pittsburgh-based street heroin distribution organization.

13. Defendants TAWON UNDERWOOD, MARLON UNDERWOOD, TERRON TAYLOR, WILLIAM SMITH, LAWRENCE SMITH and VERNON LITTLE caused the transportation of the prepackaged heroin by car from Philadelphia to Pittsburgh, Pennsylvania, where the heroin was re-packaged into ten-packet bundles and distributed and sold in the Pittsburgh area for \$200 per ten-packet bundle.

14. For the period of September 1, 2001 through December 4, 2002, defendant LUIS RAMOS, a/k/a "Juan De La Cruz," a/k/a "Popeye," organized, managed and supervised a heroin packaging and distribution conspiracy that was responsible for the acquisition, packaging, sale and distribution of more than 30 kilograms of heroin to members of the Pittsburgh-based street heroin distribution organization.

OVERT ACTS

In furtherance of the conspiracy and to accomplish its objects, the following overt acts, among others, were committed in the Eastern District of Pennsylvania:

1. In or about September 2001, defendant ANTONIO OROZSCO, a/k/a "Edwin Farinacci," a/k/a "El Monstro," recruited Charlie Vega, charged elsewhere, and three other heroin couriers to travel to Guayaquil, Ecuador for the purpose of obtaining Colombian heroin and smuggling the heroin from Ecuador into the United States.

2. In or about mid-September 2001, after ingesting multi-hundred gram quantities of heroin in Ecuador, Charlie Vega and three heroin couriers smuggled the heroin into the United States, arriving in Philadelphia, Pennsylvania, where they were met by defendant ANTONIO

OROZSCO, expelled the heroin from their bodies and delivered it to OROZSCO.

3. On or about September 18, 2001, defendant ANTONIO OROZSCO paid Charlie Vega in United States currency and in heroin for smuggling heroin from Ecuador into the United States, and recruited Vega for at least one more heroin smuggling trip.

4. From in or about October 2001 to in or about June 2002, Wilson Patino supplied multi-kilogram quantities of heroin in multi-hundred gram amounts to defendant LUIS RAMOS in Philadelphia, Pennsylvania at a cost of \$70 per gram.

5. From in or about October 2001 to in or about June 2002, Wilson Patino, on several occasions, supplied multi-hundred gram and multi-kilogram quantities of heroin, totaling in excess of ten kilograms, to defendant AMABLE RAMIREZ during that time period.

6. In or about November 2001, at the direction of defendant LUIS RAMOS, defendant ANTHONY HURTADO delivered \$50,000 in United States currency to Alejandro Delgado in partial payment for 1.5 kilograms of heroin Delgado delivered to RAMOS.

7. From in or about the Fall of 2001 through in or about September 2002, at the direction of defendant LUIS RAMOS, at two to three week intervals, defendants NICHOLAS DE LA CRUZ, MARLYN GARCIA, ANTHONY HURTADO, NATIVIDAD SANTANA, and MAYRA ORTIZ assisted in transporting, processing and preparing multi-kilogram quantities of heroin into numerous packets ranging from one thousand to seven thousand bundles (13,000 to 91,000 packets) intended for street distribution and sale, stamped with the “brand” logos of “Platinum,” “Holle Back,” and “Hola.”

8. In or about February 2002, at the direction of defendant LUIS RAMOS, a person known to the grand jury transferred ownership and control of a 1997 Ford Expedition to

Alejandro Delgado as a partial payment for a heroin debt incurred by RAMOS.

9. On or about March 3, 2002, defendant ANTONIO OROZSCO provided \$18,000 in United States currency to Charlie Vega, directed Vega to pay \$13,000 to a Colombia-based heroin supplier for a prior heroin shipment and to use the balance of the money to sustain himself and three other heroin couriers while they were in Colombia waiting to receive heroin for the purpose of smuggling it into the United States.

10. On or about March 15, 2002, Alejandro Delgado was arrested and 2.8 kilograms of Colombian heroin were seized from a stash house in Philadelphia and a vehicle, both of which were associated with Delgado.

11. From in or about March 2002 to in or about late August 2002, Brenda Campo-Valdez supplied multi-kilogram quantities of heroin in multi-hundred gram amounts to defendant LUIS RAMOS in Philadelphia, Pennsylvania at a cost of \$73 per gram.

12. In or about April 2002, defendant ANTONIO OROZSCO engaged in a recorded conversation with a DEA confidential source and confirmed payments of approximately \$10,000, \$12,000 and \$22,000 to Colombia-based heroin suppliers for heroin previously supplied to OROZSCO.

13. In or about April 2002, defendant ANTONIO OROZSCO paid \$9,000 in United States currency to a DEA confidential source for heroin previously supplied to OROZSCO by Colombia-based heroin traffickers.

14. On October 15, 2002, defendant LUIS RAMOS, while in Philadelphia, met with defendants TAWON UNDERWOOD and VERNON LITTLE, members of the Pittsburgh-based street heroin distribution organization, received a substantial sum of United States currency and

supplied defendants TAWON UNDERWOOD and VERNON LITTLE with a suitcase containing 3,000 bundles of packaged heroin.

15. On October 15, 2002, Wilson Patino was arrested by the U.S. Customs Service attempting to take custody of 3.4 kilograms of Colombian heroin secreted inside a suitcase that was smuggled into the United States from Venezuela.

16. From on or about October 15, 2002, to on or about December 3, 2002, Brenda Campo-Valdez, on several occasions, supplied defendant AMABLE RAMIREZ with multi-hundred gram and multi-kilogram quantities of heroin totaling in excess of four kilograms.

17. In or about the Fall of 2002, defendant ADRIAN RIOS-HERRERA used a cellular telephone to arrange and negotiate two heroin transactions with defendant LUIS RAMOS.

18. In or about the Fall of 2002, defendant ADRIAN RIOS-HERRERA supplied defendant LUIS RAMOS with 200-gram quantities of heroin on two separate occasions.

19. In or about the Fall of 2002, defendant MARGARITA ORTIZ supplied defendant LUIS RAMOS with 300-gram quantities of heroin on two separate occasions.

20. In or about the Fall of 2002, defendant ALEXIS RODRIGUEZ supplied multi-hundred gram quantities of heroin, totaling approximately 3.5 kilograms, to defendant LUIS RAMOS.

21. On or about November 1, 2002, defendant LUIS RAMOS received approximately one kilogram of heroin from defendant ALEXIS RODRIGUEZ.

22. On or about November 1, 2002, at the direction of defendant LUIS RAMOS, defendant ANTHONY HURTADO received a 450-gram quantity of heroin from defendant AMABLE RAMIREZ.

23. From on or about November 1, 2002, to on or about November 3, 2002, at the direction of defendant LUIS RAMOS, defendants NICHOLAS DE LA CRUZ, MARLYN GARCIA, ANTHONY HURTADO, KENDYS VALDEZ, LARCENY MARIA SUERO and MAYRA ORTIZ assisted in the packaging of approximately 1,500 grams of heroin into 39,000 glassine packets (3,000 bundles) stamped with the “brand” logo of “Platinum.”

24. On or about November 5, 2002, defendants LUIS RAMOS and ALEXIS RODRIGUEZ used cellular telephones to arrange the delivery of one kilogram of heroin by RODRIGUEZ to defendant LUIS RAMOS.

25. In or about early November 2002, defendant LUIS RAMOS received approximately one kilogram of heroin from defendant ALEXIS RODRIGUEZ.

26. On or about November 8, 2002, defendant VERNON LITTLE possessed, at the time of his arrest, while enroute from Pittsburgh to Philadelphia in a rented Ford Escape automobile, a total of \$185,455.00 in United States currency intended to be utilized to the complete the purchase of 3,000 bundles of heroin stamped with the “brand” logo of “Platinum” from defendant LUIS RAMOS.

27. On or about November 10, 2002, defendants TAWON UNDERWOOD, MARLON UNDERWOOD, TERRON TAYLOR, LAWRENCE SMITH and WILLIAM SMITH traveled to Philadelphia for the purpose of negotiating to purchase and acquiring a shipment of heroin packaged for street sale and distribution from defendant LUIS RAMOS.

28. On or about November 10, 2002, defendants TAWON UNDERWOOD, MARLON UNDERWOOD, TERRON TAYLOR, LAWRENCE SMITH, and WILLIAM SMITH successfully negotiated for and acquired 2,000 bundles of heroin stamped with the

“brand” logo of “Platinum” from defendant LUIS RAMOS.

29. In or about mid-November, 2002, defendants WILLIAM SMITH and an unknown male traveled to Philadelphia, paid defendant LUIS RAMOS for 2,000 bundles of heroin delivered on November 10, 2002, and received from RAMOS an additional 800 bundles of heroin stamped with the “brand” logo of “Platinum.”

30. On or about December 3, 2002, defendant WILLIAM SMITH, on behalf of the members of the Pittsburgh-based street heroin distribution organization, delivered a payment in United States currency to defendant LUIS RAMOS for the 800 bundles of heroin provided by RAMOS in or about mid-November, 2002, and received an additional 800 bundles of heroin stamped with the “brand” logo of “Platinum” from RAMOS.

31. On or about December 3, 2002, defendant LUIS RAMOS transported \$10,000 in United States currency (drug proceeds received from defendant WILLIAM SMITH) to the residence of defendant MARLYN GARCIA.

32. On or about December 3, 2002, defendant LUIS RAMOS instructed defendant MARLYN GARCIA to provide \$10,000 in United States currency to defendant MARGARITA ORTIZ as partial payment for two previous deliveries of heroin totaling 600 grams provided by ORTIZ.

33. On or about December 4, 2002, defendant MAYRA ORTIZ possessed at a residence at 275 W. Fisher Avenue, Philadelphia, Pennsylvania, tens of thousands of unstamped, empty glassine packets, together with several ink stamps, one bearing the heroin “brand” name “Platinum.”

34. On or about December 4, 2002, defendant MARLYN GARCIA possessed at a

heroin packaging house located at 1930 Ruan Street, Philadelphia, Pennsylvania, heroin trafficking and packaging paraphernalia, including more than 200 glassine bags containing heroin powder, hundreds of empty glassine packets, six heat sealing devices, ten grinders and one scale.

All in violation of Title 21, United States Code, Section 846.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

From on or about October 1, 2002 to on or about December 4, 2002, at 5004 F Street, Philadelphia, in the Eastern District of Pennsylvania, defendants

LUIS RAMOS and
ANTHONY HURTADO

did knowingly open and maintain a place, that is, the residential dwelling located at 5004 F Street, Philadelphia, Pennsylvania, for the purpose of manufacturing and repackaging heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 856(a)(1).

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

From on or about October 1, 2002 to on or about December 4, 2002, at 1930 Ruan Street, Philadelphia, in the Eastern District of Pennsylvania, defendants

LUIS RAMOS and
MARLYN GARCIA

did knowingly open and maintain a place, that is, the residential dwelling located at 1930 Ruan Street, Philadelphia, Pennsylvania, for the purpose of manufacturing and repackaging heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 856(a)(1).

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 15, 2002, at Philadelphia, in the Eastern District of Pennsylvania, defendants

LUIS RAMOS,
a/k/a “Juan De La Cruz,”
a/k/a “Popeye,” and
ANTHONY HURTADO,
a/k/a “Moreno”

knowingly and intentionally distributed, and aided, abetted and caused the distribution of, more than one kilogram, that is, more than 2,000 bundles of “Platinum” brand heroin packaged in glassine packets, of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A) and Title 18, United States Code, Section 2.

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 15, 2002, at Philadelphia, in the Eastern District of
Pennsylvania, defendants

TAWON UNDERWOOD
MARLON UNDERWOOD
TERRON TAYLOR
WILLIAM SMITH
LAWRENCE SMITH
VERNON LITTLE

knowingly and intentionally possessed with intent to distribute, and aided, abetted and caused the possession of, with intent to distribute, more than one kilogram, that is, more than 2,000 bundles of “Platinum” brand heroin packaged in glassine packets, of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A) and Title 18, United States Code, Section 2.

COUNT SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 1, 2002, at Philadelphia, in the Eastern District of Pennsylvania, defendant

AMABLE RAMIREZ, a/k/a “Kerving Matias,”

knowingly and intentionally distributed, and aided, abetted and caused the distribution of more than 100 grams, that is, approximately 500 grams of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B) and Title 18, United States Code, Section 2.

COUNT SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 1, 2002, at Philadelphia, in the Eastern District of
Pennsylvania, defendants

LUIS RAMOS,
a/k/a "Juan De La Cruz,"
a/k/a "Popeye,"
NICHOLAS DE LA CRUZ,
a/k/a "Felix Bernabe"
MARLYN GARCIA
ANTHONY HURTADO,
a/k/a "Moreno"
KENDYS VALDEZ,
a/k/a "Benny"
LARCENY MARIA SUERO

knowingly and intentionally possessed with intent to distribute, and aided, abetted and caused the possession of, with intent to distribute, more than one kilogram, that is, approximately 1,500 grams of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A) and Title 18, United States Code, Section 2.

COUNT EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

In or about early November 2002, at Philadelphia, in the Eastern District of Pennsylvania, defendant

ALEXIS RODRIGUEZ

knowingly and intentionally distributed, and aided, abetted and caused the distribution of more than 100 grams, that is, approximately one kilogram of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B) and Title 18, United States Code, Section 2.

COUNT NINE

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 10, 2002, at Philadelphia, in the Eastern District of Pennsylvania, defendants

LUIS RAMOS,
a/k/a "Juan De La Cruz,"
a/k/a "Popeye," and
MARLYN GARCIA

knowingly and intentionally distributed, and aided, abetted and caused the distribution of more than 100 grams, that is, approximately one kilogram, that is, approximately 2,000 bundles of "Platinum" brand heroin packaged in glassine packets, of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B) and Title 18, United States Code, Section 2.

COUNT TEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 10, 2002, at Philadelphia, in the Eastern District of
Pennsylvania, defendants

TAWON UNDERWOOD
MARLON UNDERWOOD
TERRON TAYLOR
WILLIAM SMITH
LAWRENCE SMITH

knowingly and intentionally possessed with intent to distribute, and aided, abetted and caused the possession of, with intent to distribute, more than 100 grams, that is, approximately one kilogram, that is, approximately 2,000 bundles of "Platinum" brand heroin packaged in glassine packets, of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B) and Title 18, United States Code, Section 2.

COUNT ELEVEN

THE GRAND JURY FURTHER CHARGES THAT:

In or about mid-November 2002, at Philadelphia, in the Eastern District of Pennsylvania, defendant

LUIS RAMOS,
a/k/a "Juan De La Cruz,"
a/k/a "Popeye,"

knowingly and intentionally distributed, and aided, abetted and caused the distribution of more than 100 grams, that is, approximately 800 bundles of "Platinum" brand heroin packaged in glassine packets, of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B) and Title 18, United States Code, Section 2.

COUNT TWELVE

THE GRAND JURY FURTHER CHARGES THAT:

In or about mid-November 2002, at Philadelphia, in the Eastern District of Pennsylvania, defendants

TAWON UNDERWOOD
MARLON UNDERWOOD
TERRON TAYLOR
WILLIAM SMITH
LAWRENCE SMITH

knowingly and intentionally possessed with intent to distribute, and aided, abetted and caused the possession of, with intent to distribute, more than 100 grams, that is, approximately 800 bundles of “Platinum” brand heroin packaged in glassine packets, of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B) and Title 18, United States Code, Section 2.

COUNT THIRTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 3, 2002, at Philadelphia, in the Eastern District of Pennsylvania, defendant

LUIS RAMOS,
a/k/a "Juan De La Cruz,"
a/k/a "Popeye,"

knowingly and intentionally distributed, and aided, abetted and caused the distribution of, more than 100 grams, that is, approximately 800 bundles of "Platinum" brand heroin packaged in glassine packets, of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B) and Title 18, United States Code, Section 2.

COUNT FOURTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 3, 2002, at Philadelphia, in the Eastern District of
Pennsylvania, defendants

MARLON UNDERWOOD
TERRON TAYLOR
WILLIAM SMITH
LAWRENCE SMITH

knowingly and intentionally possessed with intent to distribute, and aided, abetted and caused the possession of, with intent to distribute, more than 100 grams, that is, approximately 800 bundles of “Platinum” brand heroin packaged in glassine packets, of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B) and Title 18, United States Code, Section 2.

NOTICE OF PRIOR CONVICTION

Defendant LUIS RAMOS, a/k/a “Juan De La Cruz,” a/k/a “Popeye,” committed the offenses charged in Counts One, Two, Three, Four, Seven, Nine, Eleven and Thirteen of this Indictment after having been convicted in a court of the State of New York of the following felony drug offense:

1. Criminal Possession of a Controlled Substance, 3rd degree,
at Indictment Number 8765-95, for which he was sentenced to an
indeterminate term of imprisonment which had a minimum term of one year
and a maximum term of six years imprisonment.

NOTICE OF PRIOR CONVICTION

Defendant TERRON TAYLOR committed the offenses charged in Counts One, Five, Ten, Twelve and Fourteen of this Indictment after having been convicted in a court of the Commonwealth of Pennsylvania of the following felony drug offense:

1. Manufacture/Delivery/Possession with Intent to Deliver a Controlled Substance, a felony - Allegheny County Common Pleas Docket #9201616.

NOTICE OF PRIOR CONVICTION

Defendant VERNON LITTLE committed the offenses charged in Counts One and Five of this Indictment after having been convicted in a court of the Commonwealth of Pennsylvania of the following felony drug offense:

1. Manufacture/Delivery/Possession with Intent to Deliver a Controlled Substance, a felony - Allegheny County Common Pleas Docket #9108127.

NOTICE OF FORFEITURE

1. As a result of the violation of Title 21, United States Code, Section 846 set forth in Count One of this Indictment, the defendants

LUIS RAMOS
a/k/a “Juan De La Cruz”
a/k/a “Popeye”
ANTONIO OROZSCO
a/k/a “Edwin Farinacci”
a/k/a “El Monstro”
AMABLE RAMIREZ
a/k/a “Kerving Siez Matias”:
ALEXIS RODRIGUEZ
MARGARITA ORTIZ
ADRIAN RIOS-HERRERA:
a/k/a “Luis Hernandez”
a/k/a “El Pintor”
NICHOLAS DE LA CRUZ
a/k/a “Felix Bernabe”
NATIVIDAD SANTANA
MARLYN GARCIA
ANTHONY HURTADO
a/k/a “Moreno”
KENDYS VALDEZ
a/k/a “Benny”
LARCENY MARIA SUERO
MAYRA ORTIZ
TAWON UNDERWOOD
MARLON UNDERWOOD
TERRON TAYLOR
WILLIAM SMITH
LAWRENCE SMITH
VERNON LITTLE

shall forfeit to the United States of America:

(a) Any property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of the violation of Title 21, United States Code, as charged in this Indictment;

(b) Any property constituting, or derived from, any proceeds obtained directly or indirectly as a result of the violations of Title 21, United States Code, as charged in this Indictment, such property to include but not be limited to: 1) the sum of \$5,000,000 in United States currency; and 2) the sum of \$185,455.00 in United States currency seized from defendant VERNON LITTLE on November 8, 2002; 3) the sum of \$21,095.00 in United States currency seized from defendant LUIS RAMOS, a/k/a “Juan De La Cruz,” a/k/a “Popeye,” on December 3, 2002; and 4) the sum of \$3,248.00 seized from the residence of defendant TAWON UNDERWOOD at 32 S. Wycombe Street, Apartment 35, Lansdowne, Pennsylvania on December 4, 2003.

2. If any of the property described above as being subject to forfeiture, as a result of any act of omission of the defendants:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with a third person;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) to seek forfeiture of any other property of said defendants up to the value of the above forfeitable

property.

All pursuant to Title 21, United States Code, Section 853.

A TRUE BILL:

FOREPERSON

PATRICK L. MEEHAN
United States Attorney